



# South Coast Air Quality Management District

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FAXED: JUNE 16, 2006

June 16, 2006

Mr. Rick Kuo  
County of Los Angeles Dept. of Regional Planning  
Impact Analysis Section  
320 West Temple Street  
Los Angeles, CA 90012

**Draft Negative Declaration (Draft ND) for the Proposed Project No.  
TR066171/RENV200600049 in West Carson**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Negative Declaration (Final ND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC060525-03  
Control Number

## **Construction and Operational Air Quality Impacts**

### **Resources – 2. Air Quality (Page 10)**

1. In the Draft Negative Declaration's (Draft ND) project description, the lead agency proposes the demolition of an existing warehouse, an office building and a metal shelter and the construction of five (5) office condominiums totaling 63,300 square feet of office space. In addition, the lead agency states that about 455 cubic yards of cut and 4,345 cubic yards of imported fill would be needed from an off-site location. The ND should be recirculated to include sufficient information necessary to quantify air quality impacts such as the gross acreage of the lot and amount of acreage that is expected to be disturbed, the building area in cubic feet of the buildings that will be demolished and the number of vehicles, vehicle trips and vehicle miles traveled for the vehicles used to haul debris from the site and the import of fill during site preparation. Further, the ND should be recirculated because the lead agency does not quantify other construction air quality impacts, e.g., on- and off-road equipment, architectural coating, asphalt paving or employee work trip emissions or the proposed project's operation air quality impacts. Because this information has not been included in the Draft ND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

The environmental document should contain sufficient detail to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Therefore, the SCAQMD requests that the lead agency recirculate the Draft ND pursuant to CEQA Guidelines §15073.5 and include sufficient information on all components of the proposed project and quantify the emission estimates, emissions factors, methodologies, control efficiencies for any proposed mitigation measures, and identify significance thresholds for the proposed project. This information could be included in the final document as part of the narration or as an appendix.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2002 land use emissions model, which can be accessed at <http://www.aqmd.gov/ceqa/models.html> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. If impacts are concluded to be significant, the lead agency should also identify mitigation measures along with their associated control efficiencies, if known, for construction and operational activities for the proposed project and quantify the effects any mitigation measures will have on significant air quality impacts.

2. In the Final ND, the lead agency should discuss the influence of complying with SCAQMD Rule 403 – Fugitive Dust and Rule 402 – Nuisance. For Rule 403 – Fugitive Dust.

**Services – 1. Traffic/Access (Page 16)**

3. In the Traffic/Access Section on page 16, the lead agency discusses transportation impacts but does not disclose potential project traffic impacts for intersections potentially affected by the proposed project. The lead agency concludes that impacts will be Less than significant/No impact but does not provide even a summary of a current traffic study to support that finding. For the purposes of evaluating the proposed project's traffic impacts for CO hotspots analysis, the lead agency should at minimum include the following in the final CEQA document to demonstrate that the potential for CO hotspots is less than significant. The lead agency should identify the intersection(s) that would be affected by the proposed project; quantify the level of service and volume to capacity effects of the proposed project. Quantifying existing traffic volumes, the proposed traffic impacts and the impacts from any proposed mitigation measures are important because the results may warrant performing a CO hotspots analysis. The SCAQMD recommends that a CO hotspots analysis be performed if a project results in increasing congestion whereby the LOS of an intersection is changed from C to D or if there is a two-percent increase in the volume to capacity ratio of any intersection rated D or worse.

Should the lead agency, after estimating the proposed project's traffic impacts, believe that a CO hotspots analysis is warranted, please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address:

<http://www.dot.ca.gov/hq/env/air/coprot/htm>